

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
**TELENOR MOBILE COMMUNICATIONS AS,** :

Petitioner, :

-against- :

**STORM LLC,** :

Respondent. :

**07 Civ. 6929**

ECF Case  
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**NOTICE OF MOTION TO VACATE ARBITRATION AWARD**

**PLEASE TAKE NOTICE**, that upon the accompanying declarations of Gonzalo S. Zeballos and Anna-Marta Khomyak, the respective exhibits thereto, and the accompanying memorandum of law, Storm LLC ("Storm"), by its attorneys Lovells LLP, shall move this Court for an order vacating, pursuant to the United Nations Convention on the Recognition and Enforcement of Foreign Arbitral Awards, dated June 10, 1958, and the Federal Arbitration Act, 9 U.S.C. §§ 1 *et seq.*, a Final Award issued on August 1, 2007 in an arbitration between Storm and petitioner Telenor Mobile Communications AS.

Dated: New York, New York  
August 16, 2007

LOVELLS LLP

By: 

Pieter Van Tol (PVT-2455)  
Gonzalo S. Zeballos (GZ-5994)  
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